



**COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD
EMERGENCY RESPONSE AND SUPERFUND PROGRAM**

257528



July 13, 2005

Mr. Juan E. Dávila
Project Manager
Emergency and Remedial Response Division
Program Support Branch
Technical Pre-Remedial Support Section
U.S. ENVIRONMENTAL PROTECTION AGENCY
290 Broadway, 18th Floor
New York, NY 10007-1866

**Re: Puerto Rico Containers (PRC) (a. k. a. Union Camp, International Paper Puerto Rico,
Puerto Rico Containers Company Limited, PRCC, ABC Containers)**
State Road 2, Km 15.2, Corujo Industrial Park, Hato Tejas, Bayamón

Dear Mr. Dávila:

After the Puerto Rico Environmental Quality Board (PREQB) Superfund PA/SI Division conducted a Pre-CERCLIS Site Screening, which included a visual inspection on **June 1, 2000**, Puerto Rico Containers (PRC) was recommended for a Site Investigation under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA). PRC (also known as Union Camp, International Paper Puerto Rico, Puerto Rico Containers Company Limited, PRCC, ABC Containers) is an active site located in the Corujo Industrial Park, which is on State Road #2, Km 15.2, Hato Tejas Ward, Bayamón, Puerto Rico (Figure 1). The site coordinates, as determined with the Garmin GPS III Plus Personal Navigator, are latitude 18.408333 ° N and longitude 66.191667 ° W. PRC's property has a total superficial area of approximately 14 acres and is located in an area classified by the National Flood Insurance Program of the Federal Emergency Management Agency (FEMA) as one of minimal flooding.

Included in this letter are the findings obtained during the Site Inspection of the PRC site. This investigation was performed by personnel from the PREQB Superfund PA/SI Division and included the review of all available information obtained from different sources (including the PREQB files), a target survey, various interviews, and a visual inspection performed at PRC on **March 17, 2005**. A sampling event was not performed during this investigation due to the conditions observed at the PRC site during the visual inspection performed on **March 17, 2005**. The site conditions observed will be described later in this Site Investigation (SI) Letter Report.

**PUERTO RICO CONTAINERS (PRC)
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK,
HATO TEJAS WARD, BAYAMON, PR**

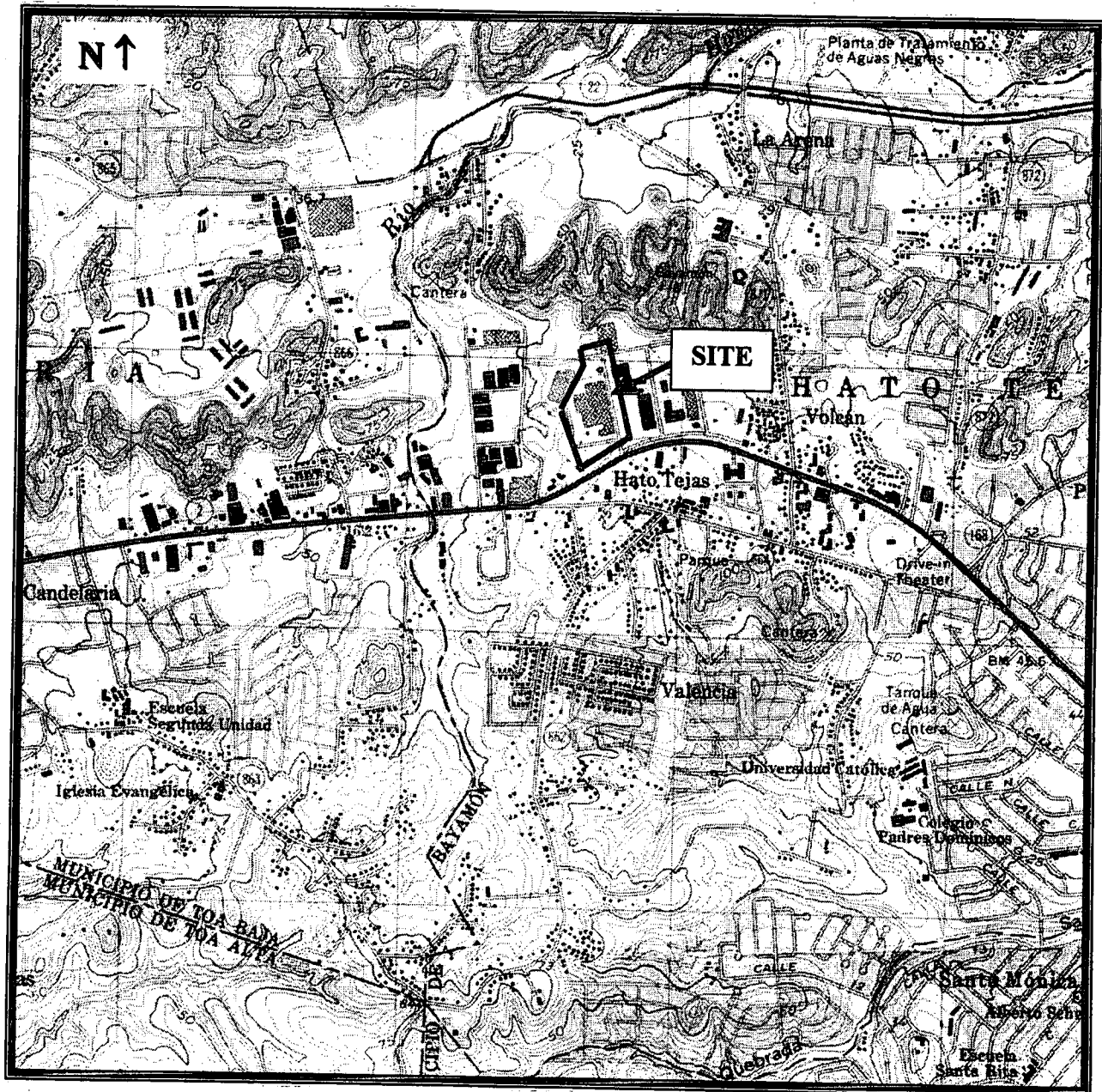


FIGURE 1: SITE LOCATION MAP
NOT TO SCALE

The PRC site has been active since 1962 and different companies have operated at the same location. Between 1962 and 1981, Puerto Rico Containers Company Limited (PRCC), a subsidiary of the International Paper Company, manufactured corrugated paper (i. e. cardboard) sheets, boxes, and containers. Mr. Roberto Valentín acquired the property on May 1981 when PRCC ceased its operations. Under the ownership of Mr. Valentín two (2) companies operated at the site, ABC Containers, which manufactured the corrugated paper (i. e. cardboard) sheets, and Puerto Rico Containers (PRC), which assembled and labeled cardboard boxes and containers. The corporation Union Camp Puerto Rico (UCPR) acquired both companies (i. e. ABC Containers and PRC) and the property in 1993. In 1999, UCPR merged with the International Paper Corporation and changed its name to International Paper Puerto Rico. International Paper Puerto Rico continued the same operations as the other companies that operated previously on site, and ceased operations in May 3, 2002. Between 2002 and 2003 the site was inactive, and then in 2003 the corporation "Desarrollos Inmobiliarios de Hato Tejas", owned by Mr. Jacobo Ortiz Nurias, acquired the property.

Currently on site there is one (1) large one-story concrete building (building #1) in the center of the property and another small one-story concrete building (building #2) with a metal roof to the southwest of building #1 (Figure 2). When personnel from the PREQB Superfund PA/SI Division performed a visual inspection on **June 1, 2000**, (when International Paper Puerto Rico was still in operation) all the manufacture processes were performed indoors and there was a water treatment plant inside building #1. There were also two (2) 5,000-gallons above ground storage tanks (each inside a primary containment system and being used for the storage of petroleum and diesel, respectively) over an outdoor area covered with grass to the south of building #1, three (3) monitoring wells to the west of building #1 (near an area from where an underground storage tank was removed in 1993), and an underground septic tank (Figure 3).

The septic tank observed during a visual inspection on **June 1, 2000** was built in 1983 and is part of a Type V-C1 (according to the PREQB Underground Injection Control Regulation) underground injection system (UIC-92-0062). This underground injection system (UIS) consists of a septic tank of three (3) chambers with a capacity of 25,380 gallons connected to a system of twelve (12) underground percolating trenches. The twelve (12) underground percolating trenches irrigate an area of approximately 4,982 square feet (ft²) that is covered with grass and to the south of building #1 (Figure 3). Between 1983 and 1997, this UIS received process waters coming from the boilers room and the printing machines, water containing glue and oil residues, and all the sanitary waters generated on site. However, after 1997, as established in the PREQB UIC permit (UIC-92-0062), it was used exclusively for the disposition of the sanitary waters generated on site.

Between 1980 and 1983, and prior to the construction of this UIS (1983), PRCC, ABC Containers, and PRC, discharged process waters (e.g. generated from the boilers room and from the cleaning process of the printing machines used in the labeling of the cardboard boxes and containers) without a National Pollutant Discharge Elimination System (NPDES) Permit into their storm sewer system. The PRC's storm sewer system connected with a drainage ditch that

PUERTO RICO CONTAINERS (PRC)
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK,
HATO TEJAS WARD, BAYAMON, PR

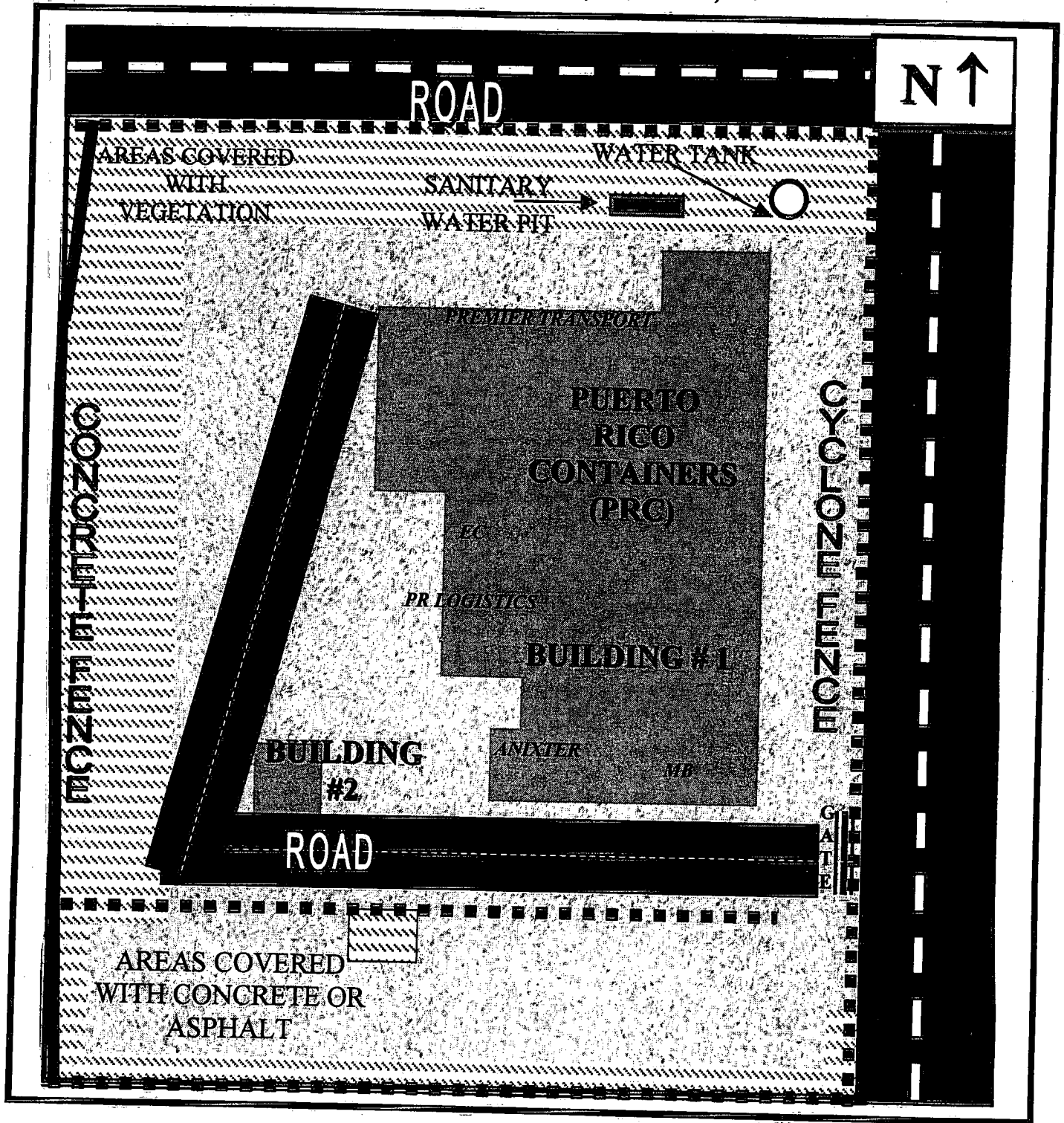
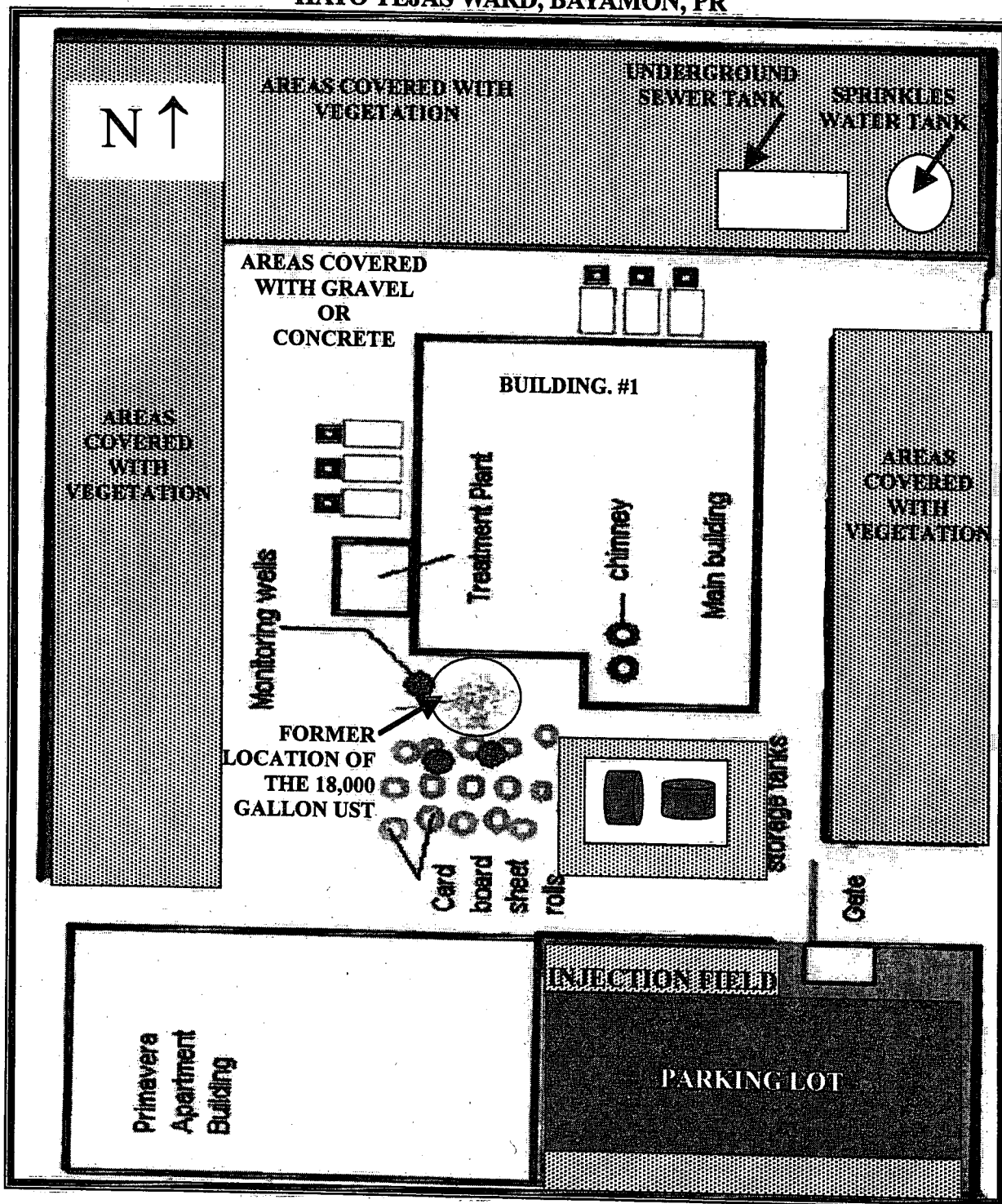


FIGURE 2: SITE SKETCH (2005)
NOT TO SCALE

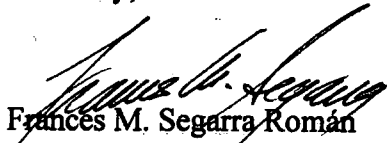
**PUERTO RICO CONTAINERS (PRC)
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK,
HATO TEJAS WARD, BAYAMON, PR**



**FIGURE 3: SITE SKETCH (2000)
NOT TO SCALE**

Considering the current conditions and all the information gathered, this site is recommended for no further action (NFA) under the Superfund Program.

Sincerely,



Frances M. Segarra Román
Superfund PA/SI Division

FMS/dcb
Enclosures

SI LETTER REPORT:
PUERTO RICO CONTAINERS
(PRC)

REFERENCES

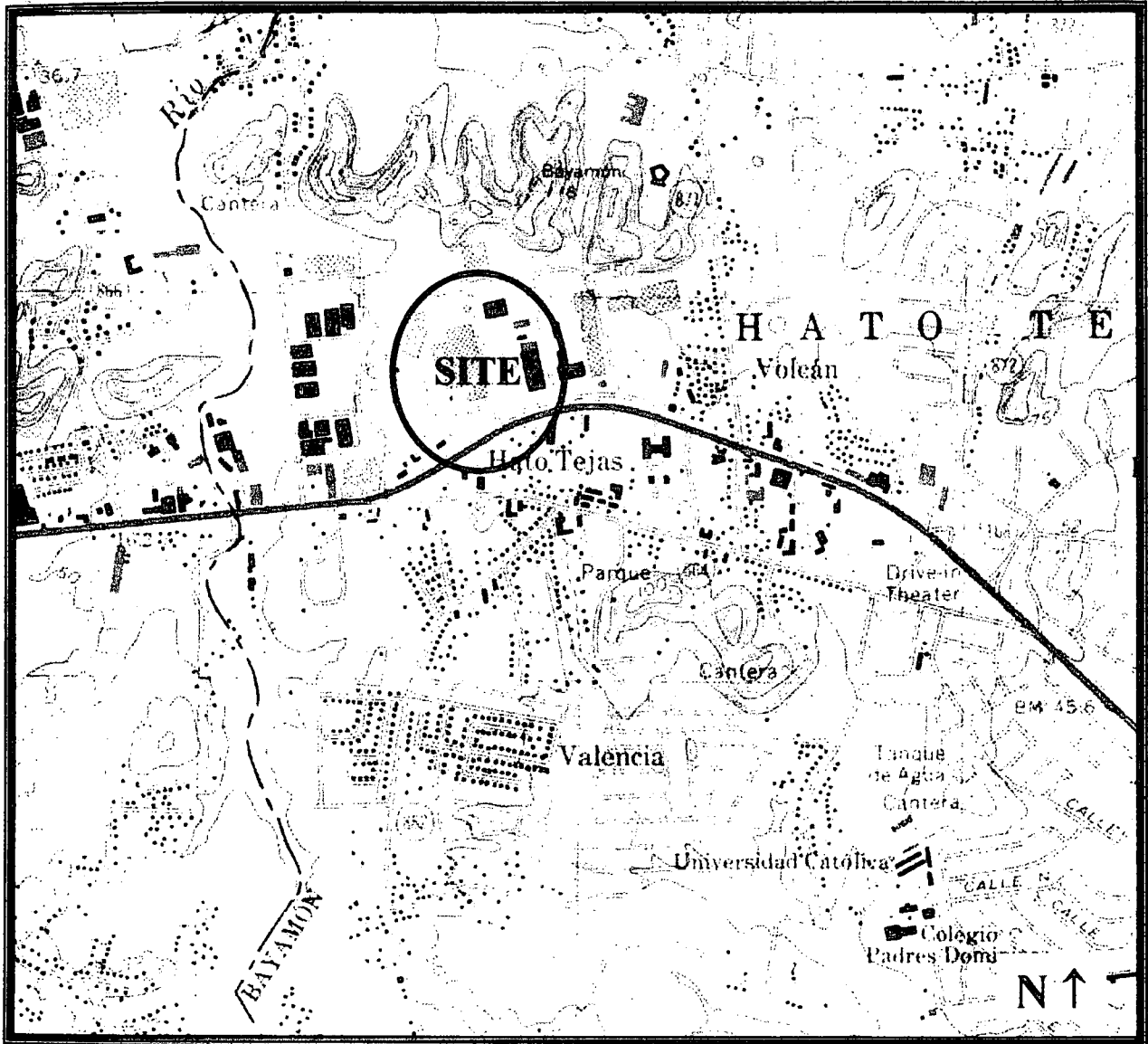
REFERENCES:

1. U. S. Geological Survey (USGS), 7.5-Minute Topographic Quadrangle Maps of Bayamón and Naranjito, Puerto Rico. **1969, Photo revised 1982.**
2. Frances M. Segarra, Senior Environmental Quality Specialist, PREQB Superfund PA/SI Division. Off / On Site Reconnaissance Information Reporting Form. RE: Visual Inspection at PRC on March 17, 2005. **May 6, 2005.**
3. Mercedes Padilla, Environmental Quality Specialist, PREQB Superfund PA/SI Division. Off / On Site Reconnaissance Information Reporting Form. RE: Visual Inspection at PRC on June 1, 2000. **June 9, 2000.**
4. Miguel A. Maldonado, Chief, PREQB Superfund PA/SI Division. Letter sent to the USEPA Region 2 Office. RE: Puerto Rico Containers (PRC). **April 10, 2001.**
5. Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Commonwealth of Puerto Rico. Community Panel Number 720000 0048 B, Panel 48 of 325. Map revised on **July 19, 1982.**
6. Mercedes Padilla, Environmental Quality Specialist, PREQB Superfund PA/SI Division. Pre-CERCLIS Screening Assessment Checklist / Decision Form. RE: PRC. **April 23, 2001.**
7. Mercedes Padilla, Environmental Quality Specialist, PREQB Superfund PA/SI Division. Abbreviated Preliminary Assessment Checklist. RE: PRC. **March 8, 2001.**
8. Frances M. Segarra, Senior Environmental Quality Specialist, PREQB Superfund PA/SI TELECOM NOTE. RE: General Information on PRC ownership and tenants. **March 31, 2005.**
9. USEPA. Administrative Order CWA-II-80-11. Finding of Violation and Order for Compliance. RE: Unauthorized discharge of process waters from PRC into a drainage ditch connecting with the Hondo River (Rio Hondo), Bayamón, PR. **April 1980.**
10. Pedro A. Gelaberth, PREQB Chairman. Administrative Order DL-82-003-051. Order to Do and Show Cause. RE: Unauthorized discharge of process waters from PRC into a drainage ditch connecting with the Hondo River (Rio Hondo), Bayamón, PR. **October 22, 1982.**
11. PREQB Water Quality Area. Application for the construction, operation or modification of an Underground Injection System. **March 1997.**

12. Eneida Hernández, Environmental Coordinator, The Shell Company (Puerto Rico) Limited. RE: Letter with the Environmental Site Assessment for PRC by SOIL TECH. **December 4, 1992.**
13. Pedro A. Marrero, Engineer, Lebrón Associates Engineering, Architectural and Planning Consultants. Letter sent to the PREQB Water Quality Area. RE: To notify of a hydrocarbons spill that occur at PRC during the removal of a 18,000 gallons UST. **August 7, 1990.**
14. SOIL TECH. Soil Sampling Report for Union Camp Puerto Rico (a.k.a. PRC). RE: Site Assessment performed at PRC on February 1993. **October 25, 1995.**
15. David. Marrero, Engineer, Lebrón Associates Engineering, Architectural and Planning Consultants. Alternative Compliance Plan and Preliminary Hydrogeological Assessment for PRC, Bayamón, PR. RE: Removal of a 18,000 gallons UST. **October 1990.**
16. Alfonzo Ramírez, General Manager, Union Camp Puerto Rico. RE: Summary of findings after a sampling event at PRC from October 9 to 11, 1995. **October 27, 1995.**
17. PREQB Water Quality Area. Underground Injection System Permit UIC-92-0062. **January 28, 1996.**
18. Ruth Acevedo, Environmental and Safety Coordinator, Union Camp Puerto Rico. Letter sent to the PREQB Water Quality Area. RE: Analytical results of samples collected at PRC on July 12 and August 1, 1996. **August 13, 1996.**
19. Ruth Acevedo, Environmental and Safety Coordinator, Union Camp Puerto Rico. Letter sent to the PREQB Water Quality Area. RE: Analytical results of samples collected at PRC on November 8, 1996. **December 2, 1996.**
20. Ruth Acevedo, Environmental and Safety Coordinator, Union Camp Puerto Rico. Letter sent to the PREQB Water Quality Area. RE: Analytical results of samples collected at PRC on May 1997. **June 5, 1997.**
21. PREQB Water Quality Area. Underground Injection System Permit UIC-92-0062. **July 21, 1998.**
22. Angel Ortega, Manufacture Manager, International Paper Puerto Rico. Letter sent to the PREQB Water Quality Area. RE: Report on analytical data from samples collected from the monitoring wells at PRC from October 24, 1996 to November 29, 1999. **February 16, 2000.**
23. PREQB Water Quality Area. Underground Injection System Permit UIC-92-0062. **September 1, 2000.**

State Road 2, Km 15.6, Corujo Industrial Park, Hato Tejas Bayamón, PR

24. Ivonne Santiago, Director, PREQB Water Quality Area. Letter sent to International Paper Puerto Rico. RE: PRC was relieved (International Paper Puerto Rico at the time) from carrying out any additional corrective or remediation action under the PREQB Underground Storage Tank Control Regulation. **June 10, 2002.**
25. PREQB Water Quality Area. Underground Injection System Permit UIC-92-0062. **November 8, 2002.**



REFERENCE /

REFERENCE 2

OFF/ON SITE RECONNAISSANCE INFORMATION REPORTING FORM

Date: March 17, 2005

Site Name: Puerto Rico Containers (PRC) (a. k. a. Union Camp, International Paper,
Puerto Rico Containers Company Limited, PRCC, ABC Containers)

Site Address: State Road 2, Km 15.2, Corujo Industrial Park, Hato Tejas, Bayamón, PR

EQB Personnel:	Name	Discipline
	Nereida Hernández Morales	Environmental Quality Specialist II
	Frances M. Segarra Román	Environmental Quality Specialist II

Weather Conditions (clear, cloudy, rain, snow, etc.):

Sunny day

Wind:

Approximately 2 mph east -northeast

Estimated temperature:

88-90° F

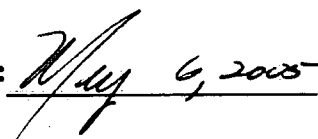
Signature:


Frances M. Segarra

Environmental Quality Specialist II

PREQB - Superfund PA/SI Division

Date:


3/24/05

OFF/ON SITE RECONNAISSANCE INFORMATION REPORTING FORM

Date: March 17, 2005

Site Name: Puerto Rico Containers (PRC) (a. k. a. Union Camp, International Paper, Puerto Rico Containers Company Limited, PRCC, ABC Containers)

Site Address: State Road 2, Km 15.2, Corujo Industrial Park, Hato Tejas, Bayamón, PR

1500 hours Arrived to the Puerto Rico Containers (PRC) site located on the Corujo Industrial Park, which is to the north of the State Road #2 (Figure 1). PRC no longer operates at the site; however, the following companies occupy the property: Muebleria Berrios, ANIXTER, Easy Rental Equipments, Econocaribe Consolidators, Inc., Premier Transport, and PR Logistics. There is a large one-story concrete building (building #1) in the center of the property and another small one-story concrete building (building #2) with a metal roof to the southwest of building #1 (Figure 2).

1502 hours Entered the main gate located on the southeastern corner of the site. A cyclone fence borders the southern, eastern, and northern sides of the property. Most of the superficial area on the southern and eastern sides of the property is covered with concrete or asphalt, except for small-vegetated areas adjacent to and along the eastern and southern fences. No stressed vegetation was observed in these areas. The Primavera Apartment buildings are adjacent and to the west of the site. A concrete fence that runs south to north and reaches the northern cyclone fence of the PRC's property separates the apartment buildings from the site (Figure 2).

- 1505 hours** Entered Muebleria Berrios (MB), one (1) of the businesses located on the southern side of building #1, and met with Mrs. Yadira López, MB Assistant Manager. According to her, MB established this furniture store at the site approximately one (1) year ago. Mrs. López also indicated that the property is owned by Mr. Jacobo Ortiz Nurias, that they have approximately 15 employees, and that they do not handle or store any hazardous substance on site.
- 1508 hours** Exit MB, walked west, and then turned right. Observed heavy machinery (e. g. cranes, catepillar tractors) from the company Easy Rental Equipment parked over a concrete covered area to the southwest of building #1.
- 1510 hours** Arrived to ANIXTER, located on the southern side of building #1 and adjacent to MB.
- 1512 hours** Met with Mr. Ricardo Agosto, ANIXTER employee. He indicated that ANIXTER sell and provides services to telecommunications equipment (e. g. network wiring, electronic wires, electronic cables). According to Mr. Agosto, ANIXTER established their operations on site approximately on June 2003.
- 1515 hours** Left ANIXTER and drove north and along building #1. There is a large area covered with vegetation on the western corner of the site and an asphalted road that borders the western side of building #1 (Figure 12). This road reaches the north side of the property (Figure 2). No stressed vegetation was observed in the area described.
- 1518 hours** Reached the western side of building #1 where Econocaribe Consolidators, Inc. (EC), and PR Logistics are located.
- 1520 hours** Met with Mr. Enrique Coello, EC General Manager. He indicated that EC have been at the site since June 2004 and is engaged in the international transport services (i. e. imports and exports). This company is a non vessel-operating common carrier that handles less than container load (LCL), full container load (FCL), and air cargo into many destinations worldwide, including the Caribbean,

Central, and South America. Mr. Coello indicated that they also offer import transportation services from many origins around the world into the United States and that they do not handle or storage any hazardous substance on site.

- 1525 hours** Left Mr. Coello's office and walked to the PR Logistics offices, which are adjacent to EC administrative offices and warehouses.
- 1526 hours** Entered Mrs. Enid Gerena, PR Logistics Accountant. Mrs. Gerena indicated that PR Logistics began to operate at this location on June 2004 and is engaged in storage and transportation of goods. She also informed that there are approximately 25 employees in their company and they do not handle or store any hazardous substance.
- 1529 hours** Left Mrs. Gerena's office and drove to the northern side of the property.
- 1532 hours** Reached the north side of the property where there is a large vegetated area that begins at the northern cyclone fence and reaches a large shipping area that is adjacent and to the north of building #1. This shipping area is mostly covered with asphalt, except for the northern border, which is adjacent to the vegetated area described above and is covered with gravel.
- 1535 hours** Entered Premier Transport (PT) administrative offices and met with Mr. José Jiménez, Operations Supervisor. According to Mr. Jiménez, PT is engaged in the transportation of goods. He also indicated that they have 35 employees, including the truck drivers. PT does not handle, store or transport hazardous materials, and it has been in this location since 2003.
- 1538 hours** Exit building #1 and returned to the shipping area on the north side of the property.
- 1543 hours** Reached the northwestern corner of the property. Observed a pile of approximately six (6) old used tires (i. e. truck tires) placed directly over the gravel (of the shipping area previously described) and next to hardware materials

(e. g. metal racks, electrical cable rolls). Approximately ten (10) container trucks were also observed in the asphalted section of the shipping area. No stressed vegetation was observed in the large vegetated area on the north side of the site.

1544 hours Reached an empty concrete sanitary water pit located on the eastern corner of the property.

1545 hours Continued walking southeast to reach the eastern cyclone fence. Most of the superficial area along the eastern side of the PRC's building #1 is covered with concrete and asphalt, except for a small portion adjacent to and along the fence that is covered with vegetation. No stressed vegetation was observed in this area also.

1548 hours Drove back to the southern side of the site and passed by building #2.

1600 hours Reached a parking lot located between the southern fence and building #1. Most of the superficial area to the south of the building is covered the either asphalt or concrete as well as the parking lot.

1605 hours Completed the visual inspection and left PRC's site.

OFF / ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM

Date: March 17, 2005

Site Name: Puerto Rico Containers (PRC) (a. k. a. Union Camp, International Paper, Puerto Rico Containers Company Limited, PRCC, ABC Containers)

Site Address: State Road 2, Km 15.2, Corujo Industrial Park, Hato Tejas, Bayamón, PR

Camera: Canon Sure Shot T-50

Film: KODAK Gold 100; 12 Exposures

Photographer: Frances M. Segarra

PHOTO NUMBER	TIME (HOURS)	DESCRIPTION
1	1543	View of the west side of the PRC's property. Photo was taken looking southwest from a large area covered with vegetation that is on the northern and northeastern side of the property. Observed that there is an asphalted road that borders the western side of the PRC's building #1 and reaches the northeastern side of the site. No stressed vegetation was observed in the large vegetated area described before.
2	1544	View of the northeastern side of the site. Photo was taken looking east from the northern corner of the property. A cyclone fence borders the eastern and northeastern sides. Observed that the vegetated area on the north and northeastern sides of the property begins at the fence and reaches a large shipping area covered with gravel and asphalt. This shipping area is adjacent and to the northeast of PRC's building #1.
3	1545	View of the shipping area located on the northeastern side of the PRC's building #1. Photo was taken looking southeast from the northern corner of the site. Observed a pile of approximately six (6) old used tires (i. e. truck tires) directly over the gravel (of the shipping area previously described) and next to hardware materials (e. g. metal racks, electrical cables rolls). Approximately ten (10) containers trucks were also observed in the asphalted area of the shipping area.
4	1547	View of an empty concrete sanitary water pit located on the eastern corner of the property. Photo was taken looking south and down towards the containment pit.

OFF / ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM CONTINUATION

PHOTO NUMBER	TIME (HOURS)	DESCRIPTION
5	1549	View of the eastern side of the PRC's property. Photo was taken looking south towards the cyclone fence bordering the eastern side of the site. Most of the superficial area along the eastern side of the PRC's building #1 is covered with concrete and asphalt, except for a small portion adjacent to and along the fence that is covered with vegetation. No stressed vegetation was observed in this area.
6	1550	View of the concrete covered shipping area adjacent and to the northeast of the PRC's building #1. Photo was taken looking north.
7	1555	View of a large area covered with vegetation on the western corner of the site. Photo was taken looking west. No stressed vegetation was observed in this area.
8	1556	View of the western side of the PRC's building #1. Photo was taken looking east towards the building. There is a small metal structure to the west of the PRC's building #1. Most of the superficial area bordering and adjacent to the northern and western sides of the PRC's building #1 is covered with asphalt and concrete.
9	1559	View of the Primavera Apartment buildings that are to the west of the PRC site. Photo was taken looking west from the site. Observed that there is a large asphalted parking area to the west of the PRC's building #1. A concrete fence separates the apartments from the site.
10	1600	View of the south and southeastern sides of the PRC's building #1. Photo was taken looking north. Most of the superficial area to the south of the building is also covered the either asphalt or concrete as well as the parking area to the west of it.
11	1601	View of the northeastern side of the PRC's building #1. Photo was taken looking northeast towards the building. A cyclone fence also borders this side of the property.
12	1605	View of the northeastern corner of the PRC's building #1. Photo was taken looking southwest towards the site.

OFF/ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM
PUERTO RICO CONTAINERS
MARCH 17, 2005
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK, HATO TEJAS WARD, BAYAMON, PR

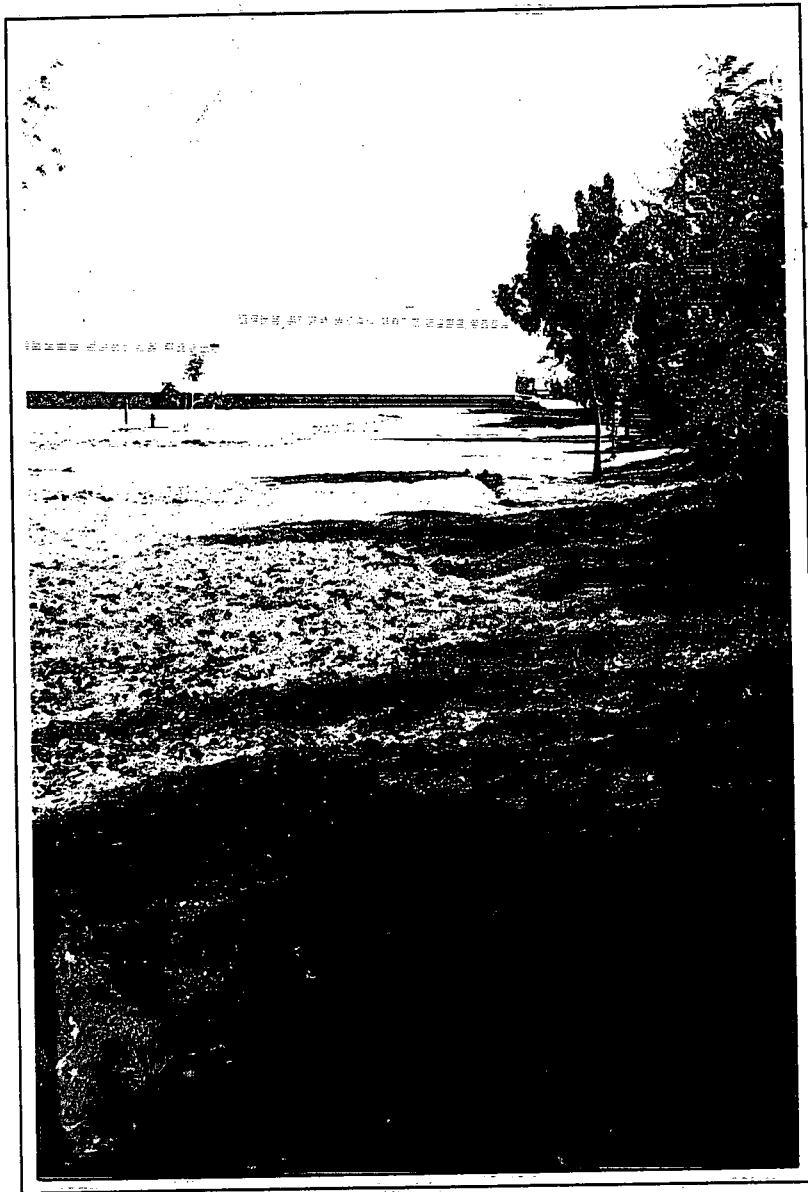


PHOTO 1

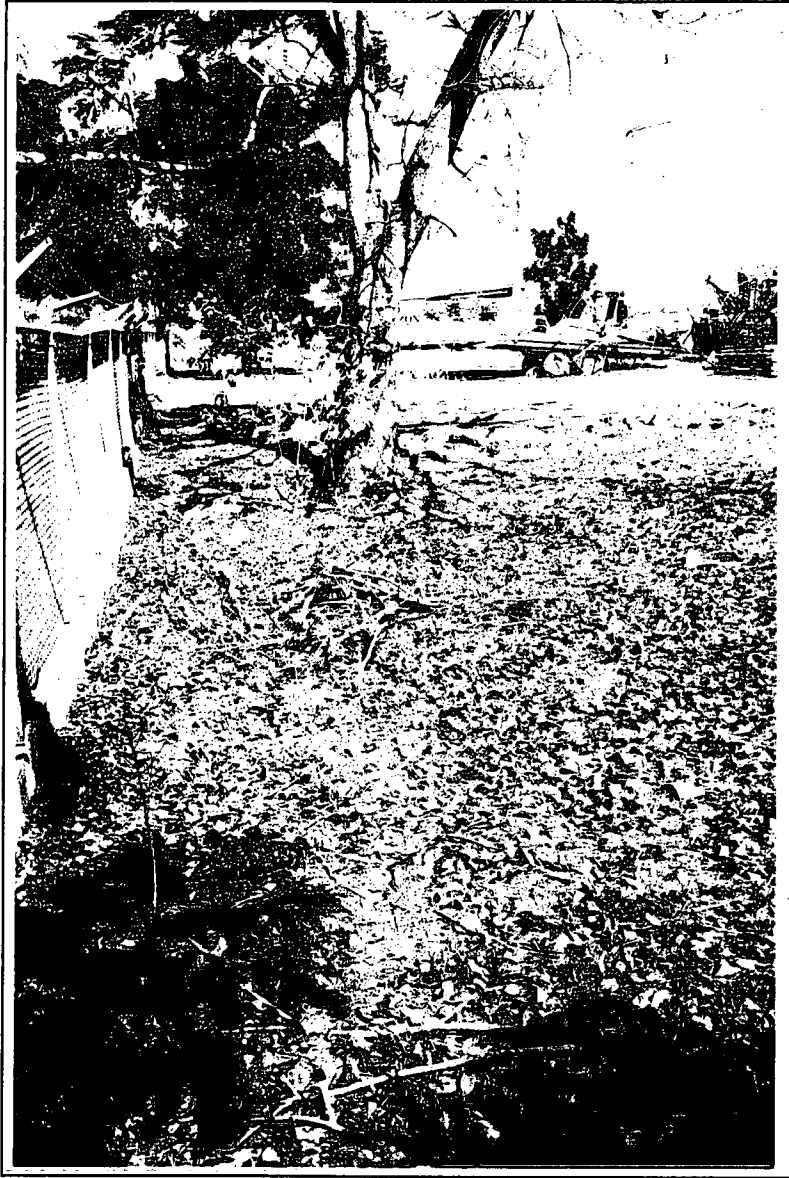


PHOTO 2

OFF/ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM
PUERTO RICO CONTAINERS
MARCH 17, 2005
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK, HATO TEJAS WARD, BAYAMON, PR

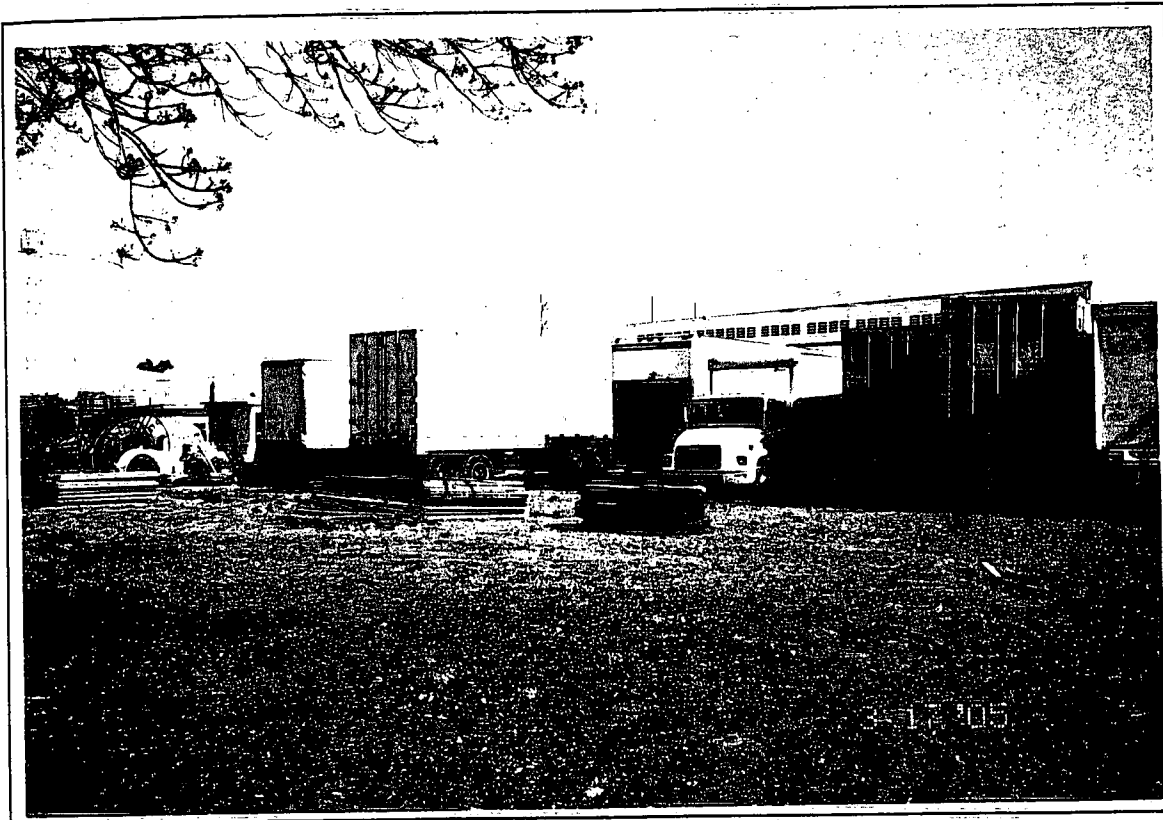


PHOTO 3

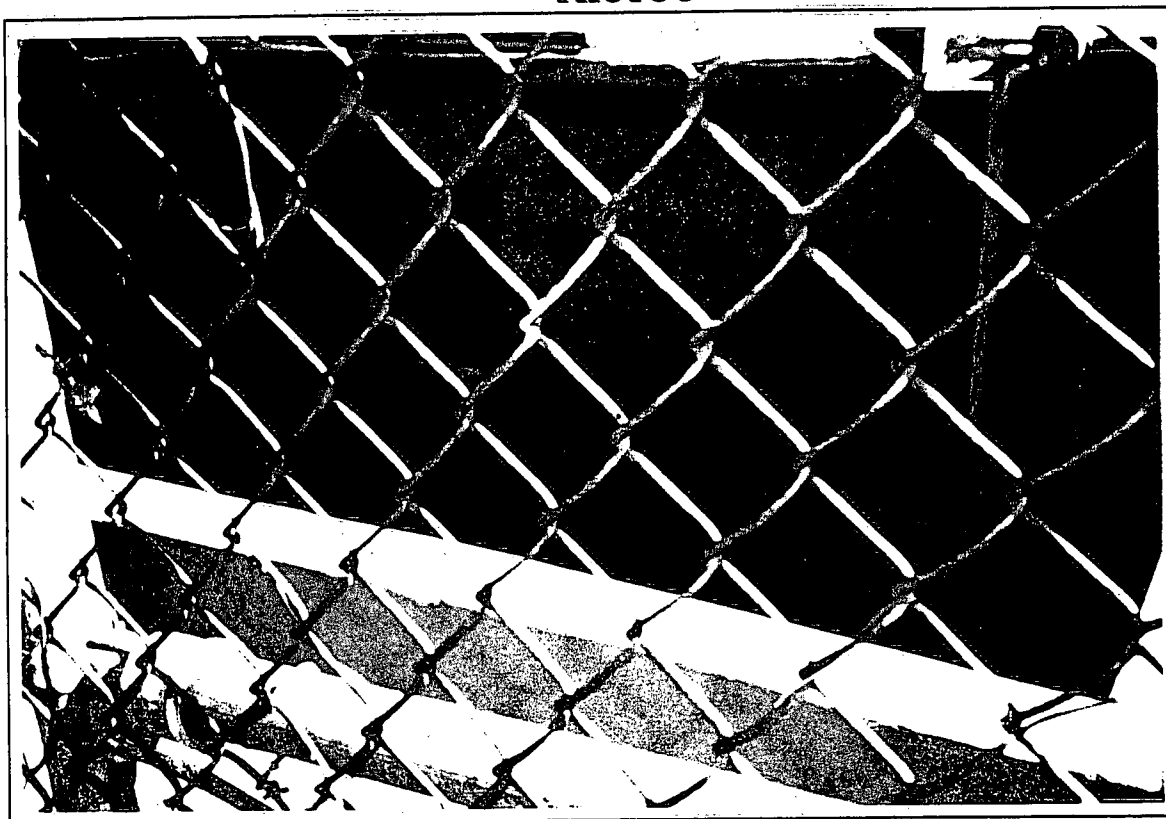


PHOTO 4

OFF/ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM
PUERTO RICO CONTAINERS
MARCH 17, 2005
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK, HATO TEJAS WARD, BAYAMON, PR



PHOTO 5

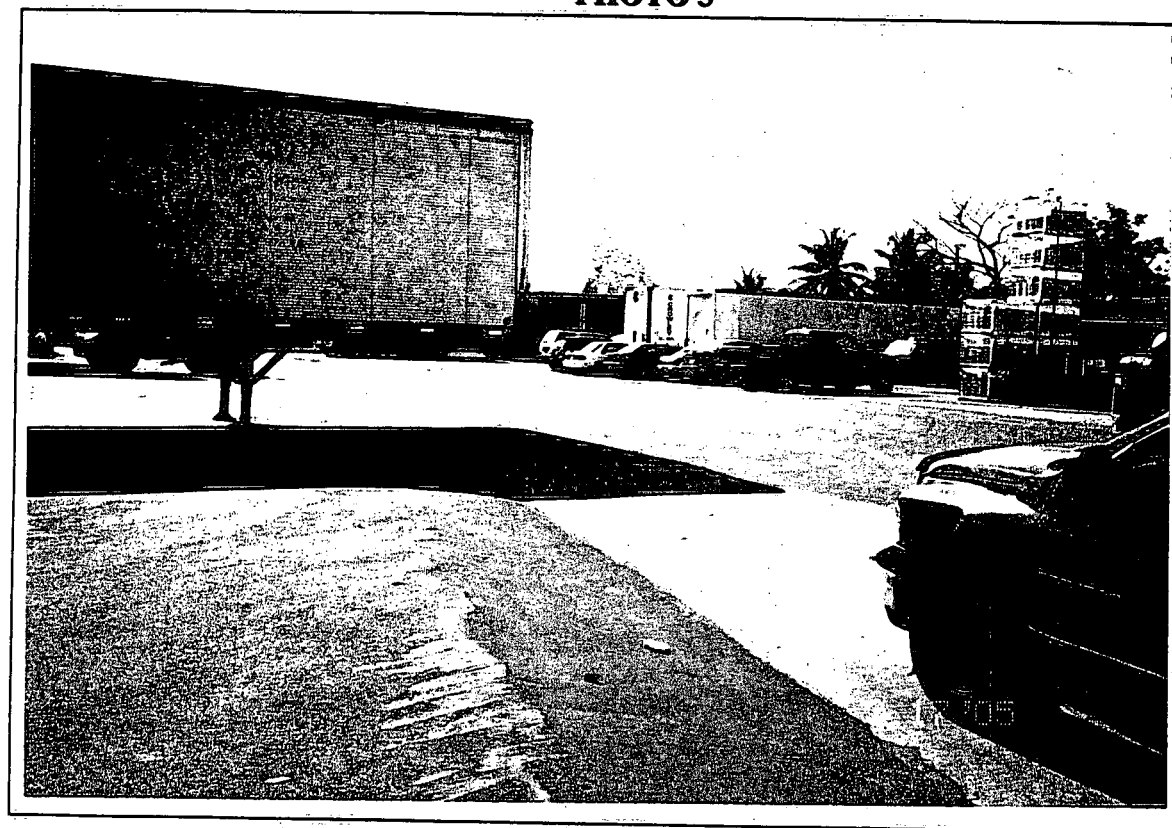


PHOTO 6



PHOTO 7

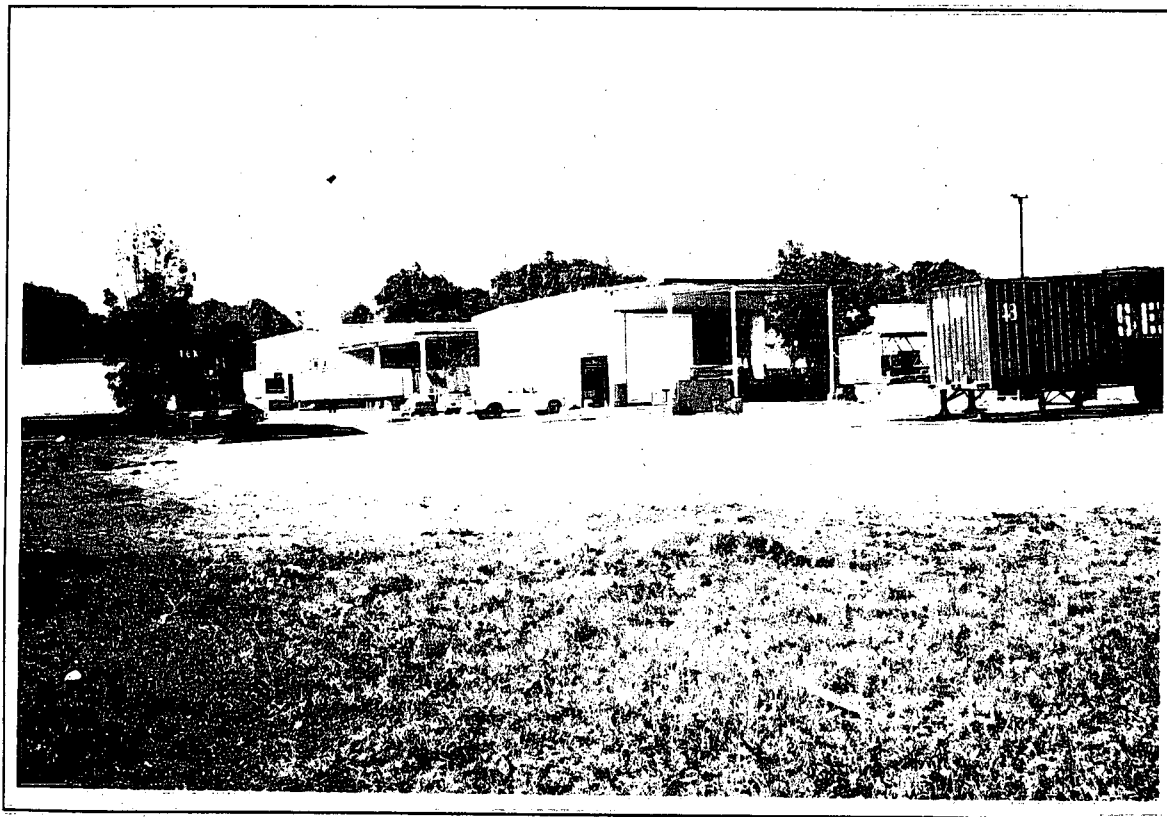


PHOTO 8

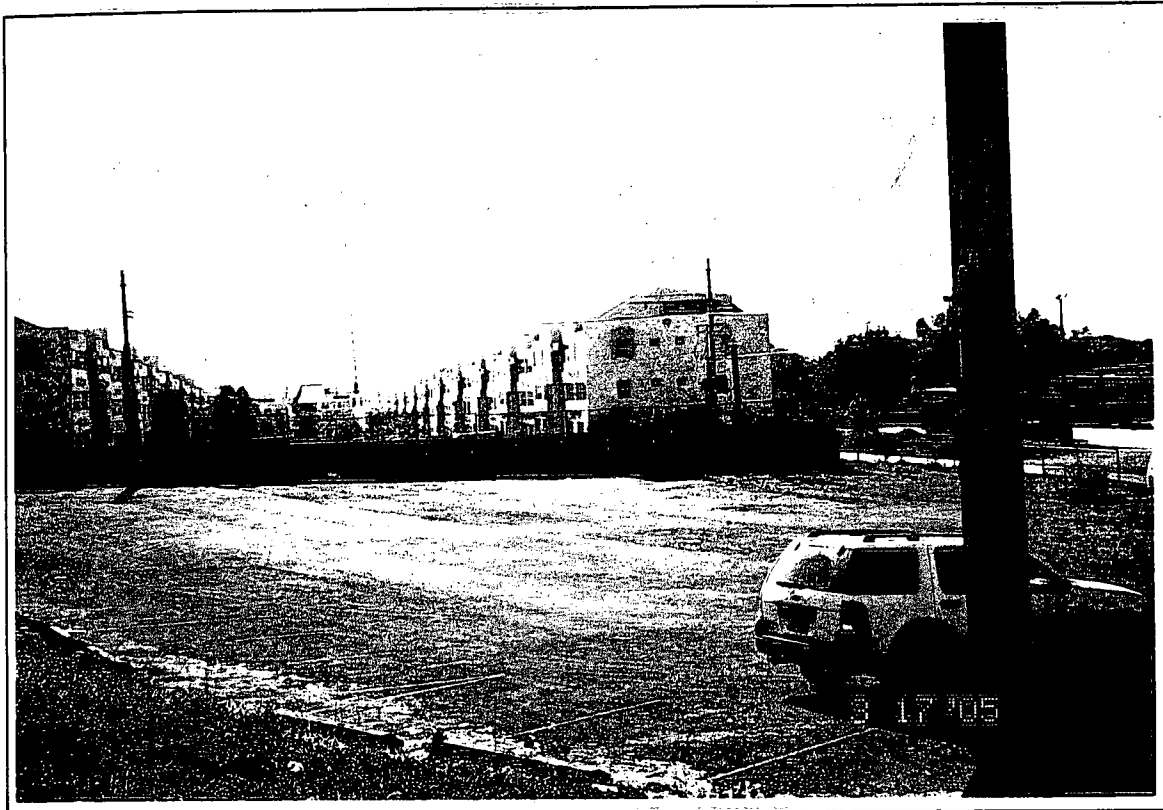


PHOTO 9



PHOTO 10

OFF/ON SITE RECONNAISSANCE PHOTO LOG REPORTING FORM
PUERTO RICO CONTAINERS
MARCH 17, 2005
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK, HATO TEJAS WARD, BAYAMON, PR

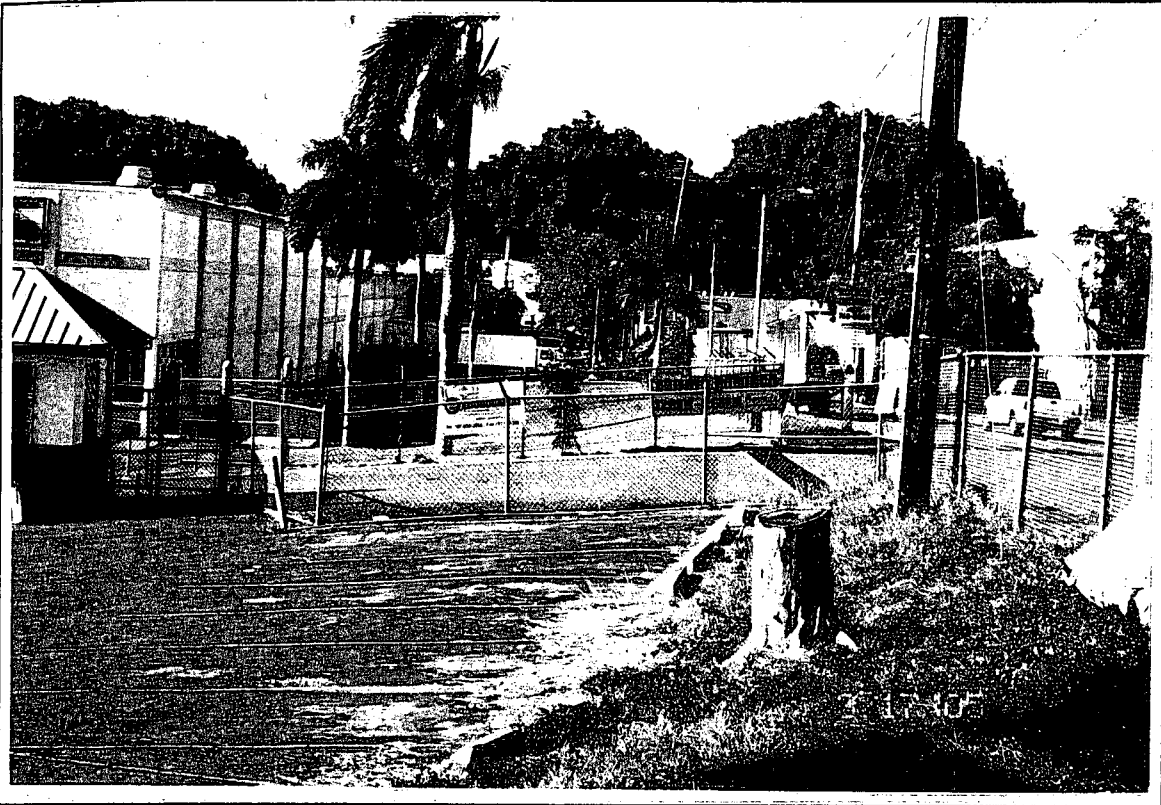


PHOTO 11

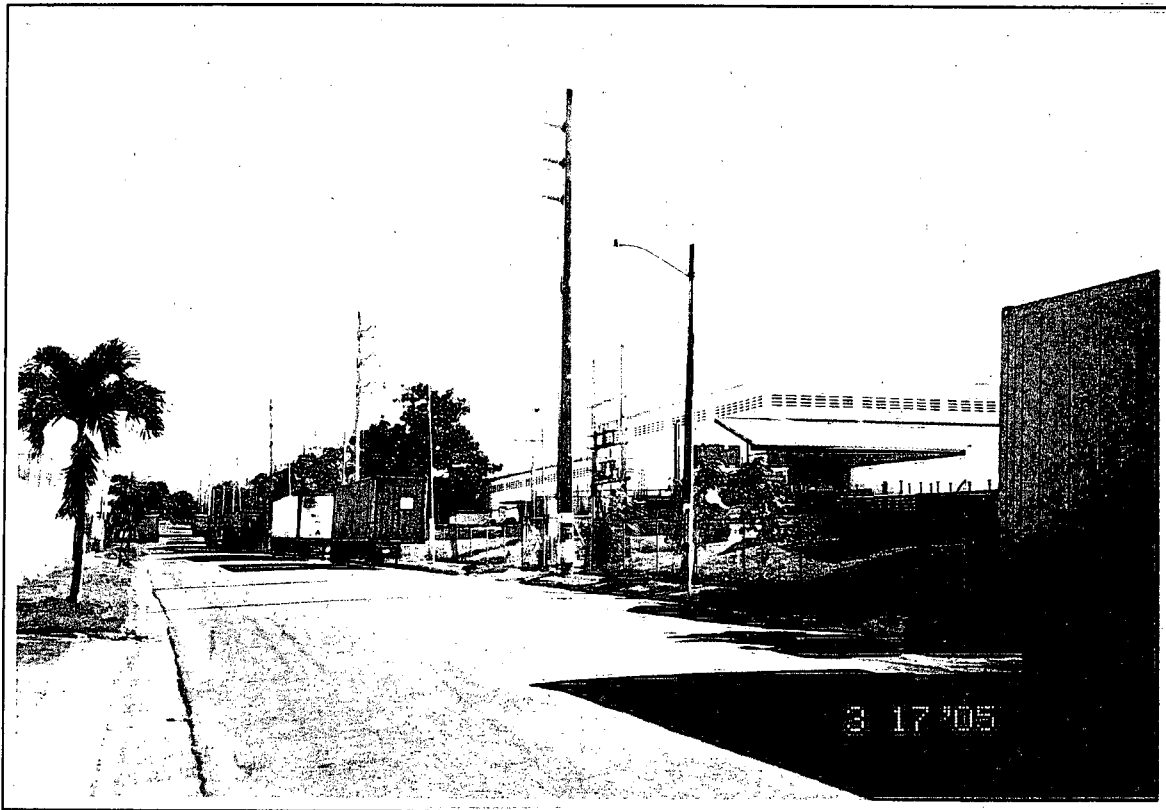


PHOTO 12

REFERENCE 4



**GOVERNMENT OF PUERTO RICO / OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD
EMERGENCY RESPONSE AND SUPERFUND PROGRAM**

April 10, 2001

Ms. Denise V. Zeno
Project Manager
Emergency and Remedial Response Division
Program Support Branch
Technical Pre-Remedial Support Section
US ENVIRONMENTAL PROTECTION AGENCY
290 Broadway 18th Floor
New York NY 10007-186

Dear Ms. Zeno:

Re: Puerto Rico Container Co. Limited (PRCC)
(Also known as Union Camp or International Paper)
State Road # 2, Km 15.2
Corujo Industrial Park
Hato Tejas, Bayamón

The Puerto Rico Environmental Quality Board (PREQB) conducted a Pre-CERCLIS Screening Assessment for the facility known as Puerto Rico Container Co. Limited, located in Bayamón, Puerto Rico. The EPA ID No. for this site is PRD090021874. This investigation was performed under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 and the Superfund Amendments and Reauthorization Act (SARA) of 1986. The scope of the investigation included the review of available information from the PREQB files, a target survey, several telephone interviews, and an Off/On-Site Reconnaissance on June 1, 2000.

Site Location:

Puerto Rico Container Co. Limited (PRCC) is located on State Road No. 2, Km 15.2, Corujo Industrial Park, Hato Tejas, Bayamón (Figure 1). The facility consists of approximately 14 acres with one building of 182,000 square feet, a 18,000 gallons petroleum tank, a 5,000 gallons diesel tank, and a 300,000 gallons water tank. The facility is totally fenced and partially paved with cement and asphalt. The geographic coordinates are 18° 24' 30" N latitude and 66° 11' 30" W longitude.

The site is surrounded by an access road (between PRCC and A.J.M. Meat Packing, Inc.) on the north side, by another access road (between PRCC and Caribe Industrial System Inc.) on the east side, by Empire Gas and a residence on the west side, and by State Road No. 2 and the Primavera Condominium, which is under construction, on the south (Figure 2).

The reported total precipitation on the Candelaria Station was 1.80 inches for March 1994 (Reference 1). The land where the site is located is classified by the Soil Conservation Service as Uv-Urban land-Vega Alta complex. In undisturbed areas, the Vega Alta soils have a surface layer of dark yellowish brown and friable clay loam about 8 inches thick. The subsoil from 8 inches to a depth of 52 inches is mainly red, strong brown, brownish yellow, and dark red clay. From 52 inches to a depth of 84 inches, the subsoil is dark red, brownish yellow, and light gray friable clay. Urban land consists mainly of houses, industrial buildings, parking lots, streets, and other structures related or associated with development. The landscape has been altered in places by cutting, filling, grading and shaping (Reference 2).

Operational History:

Puerto Rico Container Co. Limited (PRCC) is an active facility presently known as International Paper. PRCC and ABC Container Divisions operate onsite and are part of the International Paper Corporation. This company is involved in the manufacture of board sheets and cardboard boxes. In 1962 the International Paper was the corporation that operated the PRCC onsite location. In 1981 they closed the facility and sold the property to Mr. Roberto H. Valentín. The Puerto Rico Container and the ABC Containers Divisions, then operated under Mr. Valentín. In 1993, Union Camp bought these facilities and continued operations. In May 1999, International Paper merged with Union Camp and the previous two divisions continue operations, nowadays.

ABC Containers is the division that manufactures the board sheets and PRCC manufactures the cardboard boxes. To manufacture these boxes, Puerto Rico Container use the board sheets that ABC Containers produce. The principal raw materials used by ABC Containers

are paper, borax, caustic soda, inks, starch, toluene, and Methyl alcohol. Information gathered from a memorandum of inspection in 1987, pointed out two hazardous components present on the glycol letterpress ink: Di-2-Ethylhexylphthalate (DEHP) and Ethylene Glycol. Ethanol and Methanol were present in the Huberflex and Huberione dyes (Reference 10).

The PREQB Superfund PA/SI personnel conducted an On Site/Off site Reconnaissance on June 1, 2000. Mr. Angel Ortega, the Production Manager, was the person interviewed and who guided us around the facility. A drainage ditch system was found onsite. Mr. Ortega explained that presently this system sends the ink and glue residues to a treatment plant. He explained that after all the process waters have been treated on the treatment plant, they are reused for the glue mixture, therefore, the company does not have any process waters effluent. The sludge generated from the treatment plant is disposed with the rest of the solid wastes. Ponce Waste is the company that picks up the solid wastes at PRCC (International Paper) and transports them to the Bayamón Municipal Landfill. After being asked about any permits with the Puerto Rico Environmental Quality Board (PREQB), Mr. Ortega informed that the facility has a permit (PFE-LC-11-0299-0101-II-C) from the Air Quality Area, to regulate the boiler emissions. They also have a permit from the Underground Injection Control Program (UIC-92-0062), for the infiltration of the sanitary waters into the ground.

Information gathered from the PREQB's Underground Injection Control (UIC) Program revealed that in April, 1980, PRCC was found in violation of their National Pollutant Discharge Elimination System (NPDES) permit No. PR0000060. The facility discharged pollutants into a drainage ditch to Hondo River (Reference 9). PREQB personnel inspected the site in July 1982. During that inspection they informed about the closure of PRCC (May 1981) and the acquisition of the facilities by ABC Container Corp. ABC Container began operations in December 1981. The inspection revealed that ABC Container operated a process water treatment plant. The process waters were discharged into the storm water system after being treated and finally discharged in the Hondo River. A second discharge from the boiler Area gained access into the storm water system. ABC Container did not have an NPDES permit during these discharges.

Three water discharges were identified:

1. 002—wash waters from the printing machines. This discharge was identified on the Compliance Report on Puerto Rico Container (NPDES PR 0000060) of 1981. The high levels of Lead and Chromium were the concern. In 1982, the new owners treated and reused these waters (500gal/day) in the preparation of the glue mixture.
2. 003—water discharge from the boilers. In 1982, this discharge ceased after it was recycled in the boilers.
3. Combined treated discharge—In December 1982, the Puerto Rico Containers operated with only one discharge, which combined the wash waters from the machines (about 200 gallons per day); the glue residue with small quantities of lubrication oil (200 gallons per day); and the sanitary waters of 50 workers (2,100 gallons per day). The process waters were directed towards the oil trap, before they were mixed with the sanitary waters. The waters were treated and finally discharged to the Hondo River through a sewer ditch.

On a December 14, 1982 letter, the ABC Company informed their intentions to eliminate this combined discharge by injecting it to the soil, by means of the construction of a septic tank system. On a November 9, 1992 letter, the Puerto Rico Container requested to the PREQB a letter with the approval for the closure of one Underground Storage Tank. They also requested a letter to the PREQB specifying that the treatment system for the recycling of the process waters does not need a permit from the PREQB nor an authorization for the irrigation of the recycled process waters on the grass. From 1996 through present, PRCC (Union Camp) submitted the Laboratory Analysis Reports from the waters being discharged in the UIC system. On some reports, the lead parameter exceeded the Water Quality National Standard for Potable Water (0.015 mg/l).

On March 21, 1990 the PREQB authorized the PRCC to remove an 18,000 gallons diesel underground storage tank (UST), located in their property. Additional information was requested and submitted to the PREQB. On April 17, 1990, soil-sampling activities were performed around the area of the underground tank. Total Petroleum Hydrocarbons (TPH) and toluene were detected as a result of these activities (Reference 8). Levels of TPH were detected in soil and groundwater,

next to the former diesel UST. This company scheduled ground water sampling events from October 1996 to November 1999, and the TPH concentrations were found to be under 100 ppm.

Information gathered from the PREQB's Land Pollution Regulation Program (LPRP) files revealed that PRCC was classified as a TSD facility in 1987, but was evaluated on several RCRA inspections as a Protective Filer. On August 18, 1990, the company submitted a notification of Hazardous Waste Activities in which a D000 was notified. This company appears in the RCRA Notifier as a Treatment and Storage (TS) Facility, however, they have never submitted a Part A Permit Application. The facility initiated a process requesting to be declassified as a Hazardous Waste Generator and TS facility. There is evidence from August 1991, that this declassification process was not concluded. The final decision is unknown.

Ground Water Pathway

The Preliminary Geologic Map of the Bayamón Quadrangle of 1962, classified the zone where the site is located as Qt- High-level terrace deposits, described as principally compact fine-grained yellow to white semi consolidated quartz sandstone; locally grades into deposits of red sandy clay. About 1/2 mile towards the North is a line of "mogotes" (Aymamón and Aguada limestone formations), and 1/2 mile towards the South there is the Cibao limestone formation (Reference 4). The ground water level where the site is located is found at a depth of 15 feet and the percolation rate is 20 minutes per inch (Reference 5). The groundwater flow is presumed to be towards the North and North-west and driven by the influence of the Hondo River. The topographic map from Bayamón shows a soil depression about 0.11 miles North from the site, which might be considered a sinkhole due to their proximity to the "mogotes" formation.

There are three monitoring wells in the facility. These monitoring wells were constructed for the detection of the TPH released to the groundwater and they were part of the closure plan of a 18,000 gallons diesel underground storage tank. The last report, submitted on February 16, 2000 by PRCC, showed levels of TPH lower than 1 mg/l in groundwater samples (Reference 6). In April 1996 Union Camp reported a 200 gallons spill of untreated process waters. In the notification letter they

alleged that the process waters did not contain any toxic chemicals, being water based ink its major contaminant (Reference 7).

The nearest private well is the A. J. M. Meat Packing, Inc. RF-108-94, located down gradient from the Corujo Industrial Park, about 300 meters North from the Site. The A. J. M. well is 600 feet in depth and the water pump was installed at 350 feet deep. The water from A. J. M. well is used for the washing meat, cooking, and for the bathrooms, but not as a drinking water source. The nearest PRASA well (known as Maderas Tratadas) is located towards the northwest, between ½ - 1 mile from the site, and serve a population of 25 people. The Levittown 2 well was closed because of high sodium and chloride levels. The wells US Navi #1 and #2 are located approximately 1.5 miles North from the site and serve a population of approximately 1000. Levittown 4 well is located northwest from the site, within the 2 miles radio, and is part of the blended system that serves a population of approximately 1,300,000.

Radius	Well name	Status/PRASA system	Population Served
0 - ¼ miles	A.J.M. Meat Packing RF-108-94		
½ - 1 miles	La Famosa FP-244-91/PR0770027	Candelaria Ward	100
	Metro Industries RF-315-93 Plaza Bayamón/ S.E. Rexach Construction (PPA-102-92) Maderas Tratadas José Díaz Ramos Comercial Valencia Gardens (FP-56-94)		>25
1 -2 miles	US Navi #1	Inactive High Na and Cl Stand by/2591 Collapsed/2591 No information/2591 Vandalized/2591 Out of service/2591	35
	US Navi # 2		1000
	Sabana Seca I		
	Levittown 2		
	Levittown 4		194
	Levittown 5		n/a
	Levittown 6		178
	Levittown 7		n/a
	Levittown 8		194

Surface Water Pathway

Puerto Rico Container is located on a 14 acres land, in an area of minimal flooding (Reference 3). The nearest river is the Hondo River, approximately 0.33 miles West from the site. The Hondo River flows into the Bayamón River at a distance of approximately 3.52 miles from the site and then into the Ensenada Boca Vieja Estuary, approximately 5.97 miles downstream from the site. There is no evidence indicating that Hondo River is being used for recreational or fishing purposes or as a water supply system.


Recommendation:

The Puerto Rico Container Co. (PRCC) is an active facility since 1962. As part of their operational history, the company discharged their process waters into the Hondo River through a storm sewer. The company has a permit to operate an Underground Injection Control (UIC) system for the domestic wastewaters that are discharged into an infiltration field. In 1998, the UIC system reported values of over 25,000 gallons per day infiltrated to the soil (Reference 11). Analytical data from the effluent of this UIC system shows lead levels that exceed the Water Quality Standard for Potable Water (Reference 12). A report sent to the PREQB informed of a spill of 200 gallons of untreated process waters at PRCC. During the site reconnaissance, however, PRCC personnel did not know that a spill ever occurred at the facility. PRCC have not taken any actions to remove the contaminated soil at their facility. PRCC uses toluene as raw material and toluene was detected in soil samples obtained during the removal of a diesel underground storage tank.

There is a potential for groundwater contamination to the nearby drinking water wells. The site is located on karst topography where mogotes and sinkholes are present.

Considering all the information gathered, we recommend a Site Inspection at PRCC to confirm onsite contamination, migration of these contaminants, and determine if nearby targets have been exposed to site related contaminants.

Sincerely,


Miguel A. Maldonado Negrón
Superfund PA/SI Division Chief

MPV/dcb

Puerto Rico Container Co. Limited
Hato Tejas, Bayamón

**PUERTO RICO CONTAINERS (PRC)
STATE ROAD 2, KM 15.2, CORUJO INDUSTRIAL PARK,
HATO TEJAS WARD, BAYAMON, PR**



Figure 1

Puerto Rico Container Co. Limited
Hato Tejas, Bayamón

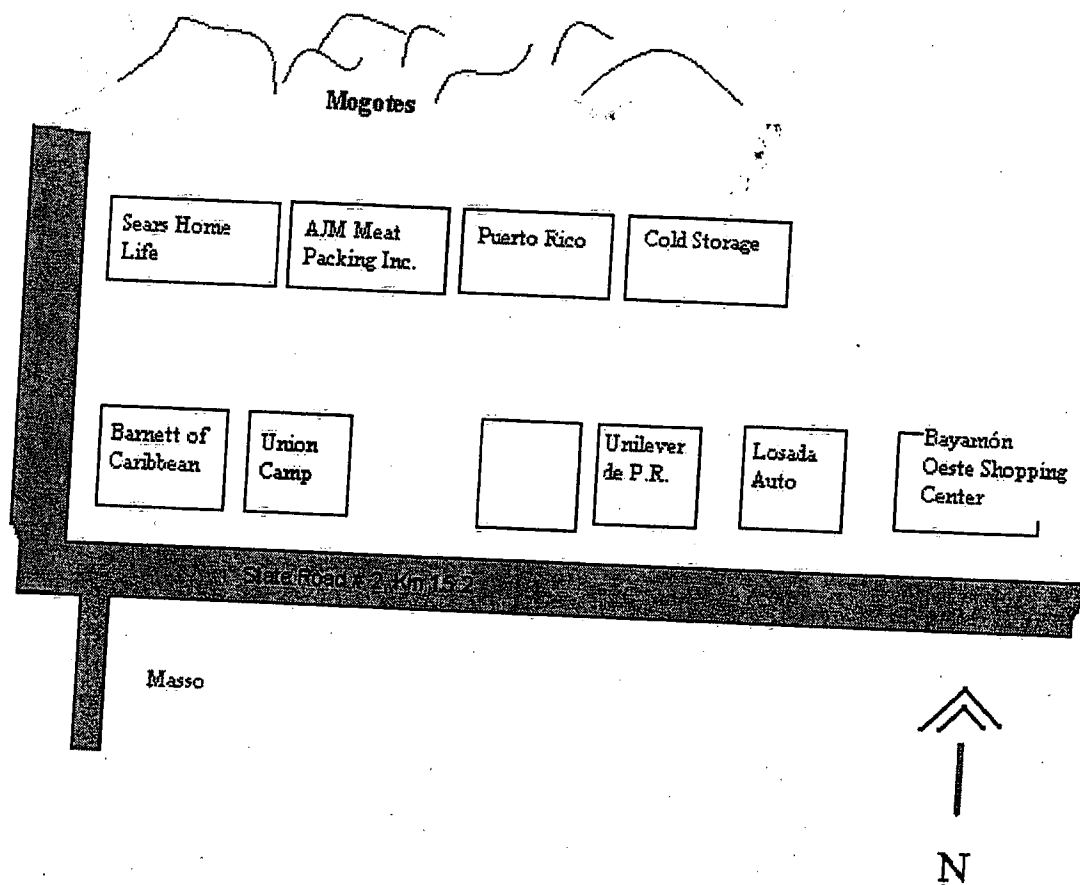
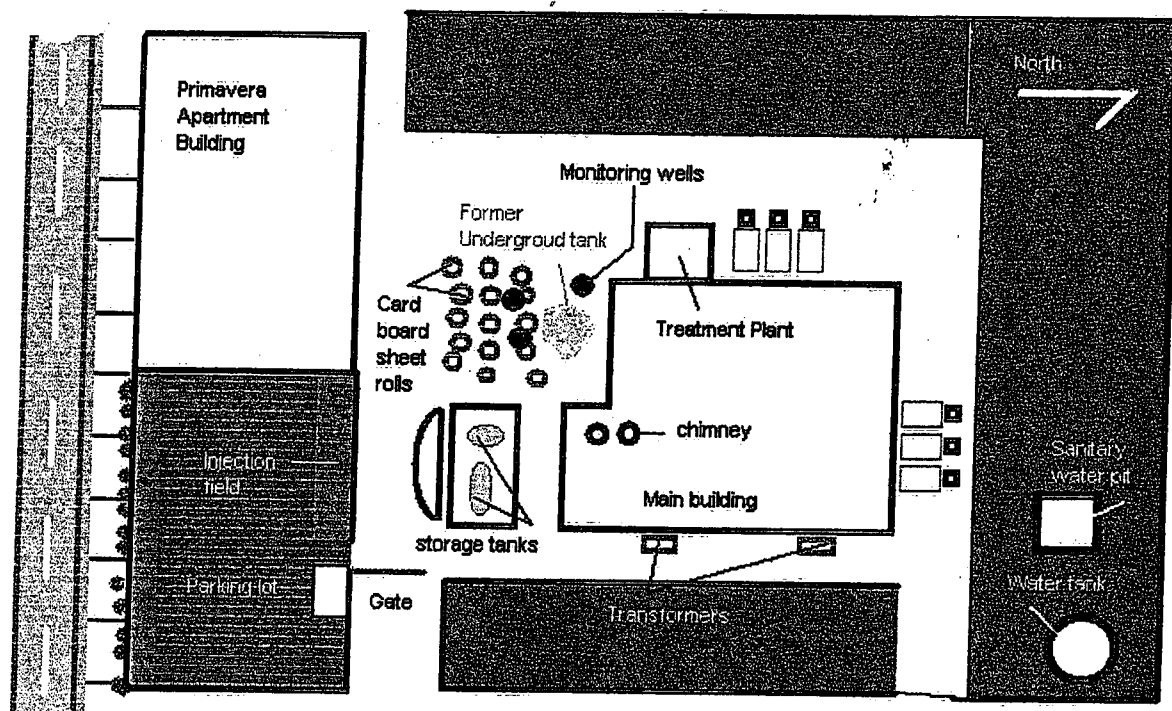


Figure 2

Puerto Rico Container Co. Limited
Hato Tejas, Bayamón



Not to scale

Figure 3